

EXHIBIT A

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST**

CONTINENTAL SERVICE GROUP, INC.,)		
and PIONEER CREDIT RECOVERY,)	
INC.,)	
Plaintiffs,)	
)	
and)	
)	
COLLECTION TECHNOLOGY, INC.,)	
PERFORMANT RECOVERY, INC.,)	
ALLTRAN EDUCATION, INC., and)	
PROGRESSIVE FINANCIAL SERVICES,)	
INC.,)	
)	
Plaintiff-Intervenors,)	
)	
v.)	Nos. 17-449C; 17-499C; 17-493C; 17-517C
)	17-578C; 17-558C; 17-633C
THE UNITED STATES,)	Consolidated
)	Judge Wheeler
Defendant,)	
)	
and)	
)	
CBE GROUP, INC.,)	
FINANCIAL MANAGEMENT)	
SYSTEMS, INC.,)	
GC SERVICES LIMITED)	
PARTNERSHIP,)	
PREMIERE CREDIT of NORTH)	
AMERICA, LLC,)	
VALUE RECOVERY HOLDINGS, LLC,)	
and)	
WINDHAM PROFESSIONALS, INC.,)	
)	
Defendant-Intervenors.)	

DECLARATION OF PATRICK BRADFIELD

I, Patrick A. Bradfield, Director, FSA Acquisitions and Head of the Contracting Activity, Federal Student Aid (FSA), United States Department of Education, hereby make the following declaration in lieu of an affidavit, as permitted by Section 1746 of Title 28 of the United States

Code. I am aware that this declaration will be filed with the United States Court of Federal Claims in connection with the bid protests captioned above and any related cases. I also understand that this declaration is the legal equivalent of a statement under oath. This declaration is provided for the purpose of supporting defendant's response to Plaintiff Continental Service Group, Inc.'s Motion To Amend The Court's Order Of December 12, 2017 To Impose A Total Cap Of 140,000 Transfers Per Month On ED's Transfer Activity. I make this declaration to the best of my knowledge and belief, based on my personal knowledge and information made available to me in my official capacity:

1. As Director, FSA Acquisitions, I supervise the contracting officers of the U.S. Department of Education charged with the administration of contracts for debt collection services and with implementing the corrective action plan first announced by the Department on May 19, 2017 under Solicitation No. ED-FSA-16-R-0009. That Solicitation is for collection services on defaulted Federal student loans. The corrective action is currently underway.
2. After the December 8, 2017 ruling by the Court of Appeals for the Federal Circuit that stayed this Court's May 31, 2017 preliminary injunction on the transfer of defaulted loan accounts, the Department transferred or assigned approximately 927,000 loan accounts to the 11 small business contracts and two award-term extension contracts recently issued to Alltran Education, Inc. (Alltran) and Pioneer Credit Recovery, Inc. (Pioneer). All of these contractors, including Alltran and Pioneer have a valid Authority to Operate.
3. I have received this Court's December 12, 2017 order, directing that the Department complete its corrective action on or before January 11, 2018. Pursuant to the Court's

order, the Department intends to complete its corrective action on or before January 11, 2018.

4. I declare under penalty of perjury that the foregoing is true and correct.
5. Executed on this 20th day of December, 2017.

**Patrick A.
Bradfield**

Digitally signed by Patrick A. Bradfield
DN: cn=Patrick A. Bradfield, o, ou,
email=patrick.bradfield@ed.gov, c=US
Date: 2017.12.20 12:09:18 -05'00'

Dr. Patrick A. Bradfield
Director, FSA Acquisitions & Head of Contracting Activity
Federal Student Aid
United States Department of Education